

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLOBAL GAMING PHILIPPINES, LLC,

Plaintiff,

v.

ENRIQUE K. RAZON, JR.;
BLOOMBERRY RESORTS AND HOTELS
INC.; SURESTE PROPERTIES, INC.,

Defendants.

No. 21-CV-2655 (LGS)-(SN)

**NOTICE OF CROSS-MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon (i) the accompanying Memorandum of Law in Support of BRHI's and SPI's Cross-Motion for Summary Judgment for Lack of Personal Jurisdiction and Opposition to Plaintiff's Motion to Enforce Arbitral Award; (ii) BRHI's and SPI's (1) Response to Plaintiff's Local Rule 56.1 Statement and (2) Further Statement of Undisputed Material Facts in Support of BRHI/SPI's Cross-Motion for Summary Judgment for Lack of Personal Jurisdiction and in Opposition to Plaintiff's Motion to Enforce Arbitral Award; (iii) the Declaration of Daniel M. Perry dated February 22, 2023 and accompanying exhibits thereto; and (iv) all other papers and proceedings in this action, Bloomberry Resorts and Hotels Inc. ("BRHI") and Sureste Properties, Inc. ("SPI," and, together with BRHI, "BRHI/SPI"), by and though their undersigned counsel, Milbank LLP, will respectfully move this Court, on a date and at a time to be determined by the Court, for an Order pursuant to Federal Rules of Civil Procedure 56: (i) granting summary judgment to BRHI/SPI on all claims in the Second Amended Complaint asserted against BRHI/SPI, and denying summary judgment to Plaintiff, (ii) dismissing all claims in the Second Amended Complaint asserted against BRHI/SPI with prejudice; and (iii) granting such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that BRHI/SPI hereby request oral argument on their motion.

Dated: February 22, 2023
New York, New York

MILBANK LLP

By: /s/ Daniel M. Perry

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